

EXHIBIT R

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF EVELYN A. LUGO

COMES NOW the declarant, Evelyn A. Lugo, duly sworn upon oath, deposes and testifies as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present at 2 World Trade Center when the terrorist attacks on the World Trade Center occurred.

4. I was working at ABM as an administrative assistant. I worked on the 35th floor of 2 World Trade Center, South Tower

5. I was in New York City at Ground Zero when the plane(s) hit the towers and I received physical injuries in the escape and collapse. In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen. The situation could only be

compared to a war zone. I was going about my everyday life in a peaceful manner when we were brutally attacked by terrorists and my life was altered forever.

6. As a result of these terrorist attacks, I suffered the following specific injury(ies) on September 11, 2001: a head injury caused by falling debris, as well as ringing in my ears due to the collapse and my subsequent escape from the building.

7. Colleagues close to me were not as fortunate and were killed that morning. The building was burning and debris was falling all around while I exited the building. As a result of the traumatic experience, I was unable to focus and had debilitating anxiety for a long period after 9/11. This was evidence in the fact that after the attacks, I was unable to maintain a job for any period of time. I found the experience to be overwhelming and I was unable to cope in the aftermath of the events of that day.

8. I sought medical attention for my injury(ies) at St. Vincent Hospital. To this day, I am still dealing with a constant ringing in my ears that started on 9/11. On December 21, 2019, I had a follow-up appointment regarding this injury.

9. I suffered, and continue to suffer, severe emotional distress as a result of the above terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to the traumatic events of these terrorist attacks. For fifteen years, I could not travel south of Canal Street in New York City; I only went back when *USA Today* featured me in their story about 9/11 memorial tattoos.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 7 day of January 2020.


Evelyn A. Lugo

Exhibits Filed Under Seal